

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
WILLIAMSPORT DIVISION**

<b>IN RE:</b>	)	
	)	
<b>MATTHEW BATEMAN</b>	)	<b>Case No.: 1:18-03445 HWV</b>
<b>BRENDA BATEMAN</b>	)	<b>Chapter 13</b>
<b>Debtor(s)</b>	)	
	)	
<b>QUICKEN LOANS</b>	)	
<b>Movant</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>MATTHEW BATEMAN</b>	)	
<b>BRENDA BATEMAN</b>	)	
	)	
<b>Respondent(s)</b>	)	
	)	
<b>CHARLES J. DEHART, III</b>	)	
<b>Trustee</b>	)	

**OBJECTION TO MOTION FOR RELIEF FROM STAY**

**TO THE HONORABLE JUDGES OF THE U.S. BANKRUPTCY COURT:**

Debtors, through their attorney, Sean P. Quinlan, Esquire, hereby represents as follows:

- 1. On or about August 18, 2018, the debtors filed a Chapter 13 Petition with this Court.**
- 2. The debtors plan as filed scheduled Quicken Loans, as mortgage holder on the debtors investment property located at 3957 Bush Court, Abingdon MD which plan proposed to sale and liquidate the property and pay 100% to all unsecured creditors with the nonexempt funds.**
- 3. On December 3, 2018 the Attorney for Quicken Loans filed a Motion for Relief from Stay stating that the debtors were deficient on their post-petition mortgage payments. The debtors were contacted and informed counsel that they had anticipated the investment property selling rather quickly and although there has been movement and interest for the sale of the investment property there have not been any contracts yet. The debtors have been unable to maintain the post-petition mortgage payments since filing and they request additional time for completion of the attempt to sale. This property is for the benefit of the Estate and should be kept under the protective stay to**

**allow for the property to be sold, the mortgage creditor paid off in full and the debtors unsecured creditors paid 100% of their debt total.**

**4. For the above stated reason, the debtors through Counsel, requests that Quicken Loans Motion for Relief from Stay be denied. That the debtors be allowed to continue with the Stay protection and continue to sale the investment property with an agreed amount of time as this property is for the benefit of the estate and equity must be used for this purpose.**

**WHEREFORE, Debtors, through undersigned, requests that this Honorable Court deny Quicken Loans Motion for Relief from Stay.**

**Dated: 12/17/2018**

**/s/ Sean P. Quinlan, Esquire  
Sean P. Quinlan, Attorney for Debtors**